

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Special Services Fees and Classifications) Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORY TO UNITED STATES POSTAL SERVICE
(OCA/USPS-13)
(August 1, 1996)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits an interrogatory and request for production of documents. Instructions included with OCA Interrogatories 1-4 to the United States Postal Service dated June 19, 1996, are hereby incorporated by reference.

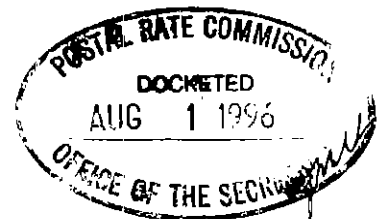
Respectfully submitted,



GAIL WILLETTE
Director
Office of the Consumer Advocate



DAVID RUDERMAN
Attorney



The purpose of interrogatory OCA/USPS-T5-4 was to have a person knowledgeable with certified mail costs and/or operations explain why unit costs have declined. At a minimum, someone should have gone through the Postal Service's cost components and activity codes to identify which costs have declined on an unit basis. As to those components or codes that exhibited a significant change, it would have been appropriate for a knowledgeable person to provide an explanation why those costs declined on an unit basis. In responding to this interrogatory, this type of effort would be appreciated.

In the future, it would be appreciated that if the Postal Service or a witness is unsure as to the scope of an interrogatory, that the OCA be consulted prior to submitting an answer. The OCA does not wish to engage in unnecessary motion practice.


OCA/USPS-13. Please refer to witness Patelunas' response to OCA/USPS-T5-4. Witness Patelunas states that there have been no processing or delivery changes what would account for the large decline in unit attributable costs.

- a. What else could have caused the decrease in unit attributable costs?

- b. Please explain why a large increase in the volume of certified mail would only cause a small decrease in attributable costs.
- c. Please provide a table, with dollar amounts, detailing the cost components or activity codes that show the decline in unit attributable costs.
- d. With regard to the unit cost items that have exhibited a significant change, please provide an explanation for the change.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.


DAVID RUDERMAN
Attorney

Washington, D.C. 20268-0002
August 1, 1996